

1 KAMALA D. HARRIS, State Bar No. 146672
Attorney General of California
2 CHRISTOPHER J. BECKER, State Bar No. 230529
Supervising Deputy Attorney General
3 DIANA ESQUIVEL, State Bar No. 202954
Deputy Attorney General
4 1300 I Street, Suite 125
P.O. Box 944255
5 Sacramento, CA 94244-2550
Telephone: (916) 445-4928
6 Facsimile: (916) 324-5205
E-mail: Diana.Esquivel@doj.ca.gov

7
8 *Attorneys for Defendants Acevedo, Baer, Beard,*
Castro, Davey, Drew, Garcia, Gipson, Godina,
Holguin, Johnson, Kaiser, LaClaire, Martinez,
9 *Overley, Pruneda, Robicheaux, Silva, Sao, Solis,*
Stainer, and Wagner

10
11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE EASTERN DISTRICT OF CALIFORNIA
13 SACRAMENTO DIVISION

14
15 **JERMAINE PADILLA,**

16 Plaintiff,

17 v.

18 **JEFFREY BEARD, et al.,**

19 Defendants.
20
21

No. 2:14-cv-01118 KJM-CKD

**STIPULATION AND PROPOSED
ORDER FOR ONE-WEEK
CONTINUANCE OF HEARING ON
DEFENDANT BEARD'S MOTION FOR
PROTECTIVE ORDER**
[L.R. 230(f)]

22 Under Local Rules 230(f) and 143, Plaintiff and Defendants, by and through their
23 respective counsel of record, stipulate to a one-week continuance of the hearing on Defendant
24 Beard's motion for protective order, currently scheduled to be heard on September 30, 2015 at 10
25 a.m. in Courtroom 24.

26 Good cause exists to grant this stipulated request because counsel for the parties will be in a
27 deposition in connection with this case on September 30. Depending on the number of matters on
28 the Court's calendar for September 30, the hearing may delay the deposition for a lengthy period

1 of time. Further, Plaintiff's counsel wishes to be present at the hearing on Beard's motion, but
2 will be unable to do so because of the pending deposition. Good cause further exists because the
3 parties have agreed to avail themselves of the Court's informal telephonic conference procedure
4 provided by Magistrate Judge Delaney. A short continuance of the hearing will allow the parties
5 to participate in this informal process, and potentially avoid having to pursue, and burden the
6 Court with, a formal discovery motion.

7 IT IS SO STIPULATED.

8
9 Dated: September 10, 2015

Respectfully submitted,

10 KAMALA D. HARRIS
11 Attorney General of California
12 CHRISTOPHER J. BECKER
Supervising Deputy Attorney General

13 */s/ Diana Esquivel*

14 DIANA ESQUIVEL
15 Deputy Attorney General
Attorneys for Defendants

16 Dated: September 10, 2015

RIFKIN LAW OFFICE

17
18 */s/ Lori Rifkin*

19 Lori Rifkin
20 *Attorneys for Plaintiff*

21 SA2014313303
22 32208407.doc

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Good cause appearing, the parties' stipulated request for a seven-day continuance of the hearing on Defendant Beard's motion for protective order is granted.

The hearing scheduled in this matter for September 30, 2015 at 10 a.m. is continued to October 7, 2015 at 10 a.m. in Courtroom 24 before the undersigned.

IT IS SO ORDERED.

Dated: September 15, 2015



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE